

SCANNED

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

UNITED STATES OF AMERICA)	No. 2:12-CR-173-GZS
)	
v.)	21 U.S.C. §§ 846, 841(a)(1), 841(b)(1)(C);
)	18 U.S.C. §§ 1347, 2
NEIL LAVERRIERE)	
ADAM GOODWIN)	

SUPERSEDING INDICTMENT

The Grand Jury Charges:

COUNT ONE
(Conspiracy)

Between about February 2010 and November 2010, in the District of Maine, Defendants

NEIL LAVERRIERE
ADAM GOODWIN

did unlawfully, knowingly, and intentionally, conspire with others known and unknown to the grand jury to distribute, dispense, and possess with intent to distribute a mixture or substance containing oxycodone, in violation of Title 21, United States Code, Sections 846 and 841(a)(1).

It is further alleged that the penalty provisions of Title 21, United States Code, Section 841(b)(1)(C) apply to the conduct described herein.

COUNT TWO
(Health Care Fraud)

Between about February 2010 and November 2010, in the District of Maine, Defendants

NEIL LAVERRIERE
ADAM GOODWIN

and others did knowingly and willfully execute, and aid and abet the execution of, a scheme and artifice to obtain, by means of false or fraudulent pretenses, representations, or promises,

property owned by, or under the custody or control of, health care benefit programs, that is, oxycodone owned by or under the custody or control of certain licensed pharmacies.

In violation of Title 18, United States Code, Sections 1347 and 2.

FORFEITURE ALLEGATION

As a result of committing the offenses alleged in Counts One and Two of this Indictment, Defendants

**NEIL LAVERRIERE
ADAM GOODWIN**

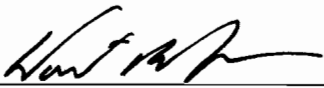
shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853 and Title 18, United States Code, Section 982(a)(7), and any and all property constituting or derived from any proceeds said Defendants obtained directly or indirectly as a result of the violations alleged in this Indictment, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations, including but not limited to a money judgment representing proceeds the defendants obtained, directly or indirectly, as a result of the offenses with which they have been charged

All in accordance with Title 18, United States Code, Sections 982(a)(1) and 982(a)(7), Title 21, United States Code, Section 853, and Federal Rule of Criminal Procedure 32.2.

A True Bill,

Signature Redacted. Original on
File

Foreperson



Assistant U.S. Attorney
Date: 11/28/12